

SO. CAL. EQUAL ACCESS GROUP  
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Attorneys for Plaintiff  
NELSON CHILIN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

NELSON CHILIN,  
Plaintiff,

vs.

JOSEPH H. RAYGOZA D/B/A UPLAND  
FLOWER; SUMIYE UMEMOTO, AS  
TRUSTEE OF THE SUMIYE  
UMEMOTO 2013 REVOCABLE TRUST;  
and DOES 1 to 10,  
Defendants.

**Case No.: 5:25-cv-00343-SHK**

**Plaintiff's Notice of Motion and Motion  
for Default Judgment by Court**

Date: August 6, 2025  
Time: 10:00 a.m.  
Courtroom: 3, 3rd Floor

Honorable Judge Shashi H. Kewalramani

To Defendants JOSEPH H. RAYGOZA D/B/A UPLAND FLOWER; SUMIYE UMEMOTO, AS TRUSTEE OF THE SUMIYE UMEMOTO 2013 REVOCABLE TRUST; and the attorneys of record, if any: Please take notice that on August 6, 2025, at 10:00 a.m., or as soon thereafter as this matter may be heard by this Court located at 3470 Twelfth Street, Los Angeles, California, Plaintiff NELSON CHILIN will present Plaintiff's motion for default judgment against Defendants JOSEPH H. RAYGOZA D/B/A UPLAND FLOWER and SUMIYE UMEMOTO, AS TRUSTEE OF THE SUMIYE UMEMOTO 2013 REVOCABLE TRUST. The Clerk has previously entered

1 the default on said Defendants on March 31, 2025 (Dkt. #9) and April 14, 2025 (Dkt.  
2 #13).

3 At the time and place of hearing, Plaintiff will present proof of the following  
4 matters: (1) Defendants JOSEPH H. RAYGOZA D/B/A UPLAND FLOWER and  
5 SUMIYE UMEMOTO, AS TRUSTEE OF THE SUMIYE UMEMOTO 2013  
6 REVOCABLE TRUST are not minors or incompetent persons or in military service or  
7 otherwise exempted under the Soldier and Sailor's Civil Relief Act of 1940; (2)  
8 Defendants JOSEPH H. RAYGOZA D/B/A UPLAND FLOWER and SUMIYE  
9 UMEMOTO, AS TRUSTEE OF THE SUMIYE UMEMOTO 2013 REVOCABLE  
10 TRUST have not appeared in this action; and (3) Plaintiff is entitled to judgment against  
11 said Defendants on account of the claims pleaded in the complaint, to wit: a violation of  
12 the Americans with Disabilities Act, the Unruh Civil Rights Act, the California Disabled  
13 Persons Act, the California's Unfair Competition Act, and Negligence.

14 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,  
15 \$2,625.00 in attorney's fees, and \$825.00 in costs as set forth in the attached Declaration  
16 of Jason J. Kim and an Order directing the Defendants to: make alterations in such a  
17 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,  
18 advantages, or accommodations offered by Defendants are readily accessible to and  
19 usable by individuals with disabilities at the property located at or about 149 N. Euclid  
20 Ave., Upland, California. This motion is based on this notice, the declarations submitted  
21 in support of this motion, and other matters which may be presented at the hearing.

22 Notice of the original motion for default judgment by court was served on  
23 Defendants JOSEPH H. RAYGOZA D/B/A UPLAND FLOWER and SUMIYE  
24 UMEMOTO, AS TRUSTEE OF THE SUMIYE UMEMOTO 2013 REVOCABLE  
25 TRUST on July 3, 2025, by first class United States Mail, postage prepaid.

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1 Dated: July 3, 2025

**SO. CAL. EQUAL ACCESS GROUP**

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3 By: /s/ Jason J. Kim  
4 Jason J. Kim, Esq.  
5 Attorneys for Plaintiff  
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